



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

July 28, 2000

Mr. James Easterly
District Engineer, IDOT
1102 Eastport Plaza Drive
Collinsville, IL 62234

Dear Mr. Easterly:

RE: Review of the Draft Environmental Impact Statement for the Mississippi River Crossing,
Relocated I-70 and I-64 Connector

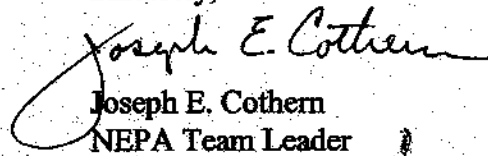
The Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Mississippi River Crossing, Relocated I-70 and I-64 Connector, in St. Louis, Missouri and East St. Louis, Illinois. Our review is provided pursuant to the National Environmental Policy Act (NEPA) 42 U.S.C. 4231, Council on Environmental Quality (CEQ) regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act (CAA). The DEIS was assigned the Council on Environmental Quality (CEQ) number 000130.

The DEIS evaluates the need for restructuring the core-area traffic network in the St. Louis/East St. Louis area, thereby relieving traffic congestion and reducing traffic accidents on the Poplar Street Bridge. Significant issues identified through the NEPA process include wetland impacts, historical and cultural resource impacts, and environmental justice impacts. The DEIS appears to satisfactorily address these issues and offers proactive mitigation measures.

Based on our overall review, and considering the level of detail that prompted each of our detailed comments (enclosed), we have assigned the DEIS a rating of LO (Lack of Objections). A copy of EPA's rating system criteria is provided as an attachment to these comments. EPA Region 7, in coordination with EPA Region 5, has identified several areas in which the DEIS might be improved, and includes recommendations for improvement as an enclosure to this letter.

EPA commends the IDOT for their efforts in interagency coordination, seeking public participation, and for exploring a range of alternatives in the NEPA process. Please send one copy of the Final EIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Royce Kemp at (913) 551-7551.

Sincerely,


Joseph E. Cothran
NEPA Team Leader

Enclosure(s) - 2

cc: Ronald Marshall, FHWA
Stephen Knobbe, MoDOT

**EPA's Detailed Comments on the Draft Environmental Impact Statement for the
Mississippi River Crossing, Relocated I-70 and I-64 Connector**

1. **Summary, Environmental Effects (pages 10-12).** The project summary does not adequately summarize: 1) endangered species impacts and endangered species mitigation measures; and 2) Environmental Justice mitigation measures. EPA recommends revising the Environmental Effects section to clarify these issues.
2. **Summary, General Comment.** This section should include the areas of controversy identified during the NEPA process, and the issues that are to be resolved, as is required by 40 CFR 1502.12.
3. **Chapter 3, Alternatives Considered, Definition of Draft EIS Alternatives (page 68).** This section requires clarification in defining the project alternatives and the proposed action. As described in the project summary, it appears that there are only two alternatives in the DEIS: 1) the no-build alternative; and 2) the proposed action, which consists of four parts (page S-4). This chapter, however, indicates that certain combinations of the proposed action are available as choices (alternatives) for selection in the DEIS (e.g., TSM Alternative), and seems to further describe all the possible project actions as separate alternatives. EPA recommends definitively listing the project alternatives in this section so that there is no confusion of what alternatives are available for selection.
4. **Chapter 3, Alternatives Considered, Traffic Projections (pages 103-120).** This section does not appear to be an alternative for consideration in the DEIS, but rather appears to be supporting information for the project need. EPA recommends clarifying the purpose of this section and/or including it in a more appropriate DEIS chapter if necessary.
5. **Chapter 4, Environmental Effects, Air Quality (pages 53-56).** This section may be too condensed to adequately present, and allow for evaluation, air quality impacts in the project area. While this section states that the project will comply with transportation conformity requirements, more detail about air quality impacts should be added in non-technical language. This additional detail is warranted given the Environmental Justice concerns within the project area. Furthermore, EPA recommends expanding this section to include all criteria air pollutants and their potential health impacts in this area and also including a thorough discussion of cumulative air quality impacts.
6. **Wetlands Comment from EPA Region 5.** The preferred alternative is likely to result in the loss of approximately 38 acres of the area's naturally-occurring wetlands. In this regard, information provided in the DEIS is sufficient to demonstrate that the avoidance and minimization requirements of the Section 404 (b)(1) Guidelines have been met on behalf of this project. The DEIS also provided enough information for our Agency to conclude that the project's conceptual wetlands compensation plan is likely to prove acceptable. In order to be found fully acceptable, additional detail concerning the specific wetlands types and acreages (by type) to be provided at the two compensation sites identified in the DEIS should be provided in the FEIS, to the extent feasible.